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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TERESA FREED,) Case No. C 06 2300 MJJ
Plaintiff,)
v.) STIPULATION AND [PROPOSED]
UNITED STATES OF AMERICA,) ORDER EXTENDING DEADLINES AND
Defendant.) ADR SELECTION

The parties to the above-entitled action, through their attorneys of record, hereby STIPULATE AND REQUEST as follows.

The parties to this action participated in a Case Management Conference on March 20, 2007, during which counsel and the Court discussed and agreed to extend certain deadlines by six weeks, in order to afford AUSA James A. Scharf, who recently associated into this case as an additional attorney for defendant, the opportunity to conduct needed discovery. Accordingly, the parties jointly request the following changes to the case schedule.

24	Event	Current Date	Proposed Date
25	Fact Discovery Cut-Off:	5/25/07	7/6/07
26	Parties to Name Experts by:	6/1/07	7/13/07
27	Expert Reports to be Tendered by:	6/8/07	7/20/07
28	Design. of Suppl. and Reb. Experts:	6/22/07	8/3/07

1 Suppl. and Reb. Expert Reports Due:6/22/07 8/3/07
2 Expert Discovery Cut-Off 7/6/07 8/17/07

3 In addition, the parties jointly request that they be permitted to participate in a private
4 mediation with either Kevin Kelly or Charlie Hawkins to occur on or about August 1, 2007, in
5 lieu of the August 1, 2007, Settlement Conference before Magistrate Judge Elizabeth D. Laporte.

6 All other deadlines will remain in effect, including but not limited to the 9/11/07 Pre-
7 Trial Conference, and the 9/24/07 Trial.

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10 Respectfully submitted,

11 DATED: March 28, 2007

12 SCOTT N. SCHOOLS
United States Attorney

13 /s/

14 JAMES A. SCHARF
15 Assistant United States Attorney
Attorney for Defendant

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17 SCOTT N. SCHOOLS
18 United States Attorney

19 /s/

20 ABRAHAM A. SIMMONS
Co-counsel for Defendant

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22 DATED: March 28, 2007

23 THE ARNS LAW FIRM

24 /s/

25 ROBERT S. ARNS
26 Attorney for Plaintiff

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28 DATED: April 4, 2007

1 DATED: March 28, 2007

LAW OFFICES OF LINDA M.
SCAPAROTTI

2
3 /s/
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5 Linda M. Scaparotti
Linda M. Scaparotti
Co-counsel for Plaintiff

6 ~~[PROPOSED]~~ ORDER
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8 Upon stipulation of the parties and good cause appearing to extend certain deadlines as
9 set forth above and to allow the parties to engage in a private mediation in lieu of the August 1,
10 2007, settlement conference, IT IS SO ORDERED.

11 Dated: 4/9/2007

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13 MARTIN J. JENKINS
14 United States District Judge
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